

LOCAL BANKRUPTCY FORM 9013-3

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	Chapter 13
	:	
Melissa Diane	:	
Fitzgerald,	:	Bankruptcy Case No. 1:16-bk-00165-RNO
	:	
	:	
Debtor,	:	<u>Nature of Proceeding:</u>
	:	<u>Motion for Relief from Automatic Stay</u>
Bank of America, N.A., its assignees and/or	:	
successors in	:	
interest,	:	Document #:51
	:	
Movant,	:	
	:	
and	:	
	:	
Melissa Diane Fitzgerald;	:	
Charles J. DeHart, III,	:	
Trustee,	:	
	:	
Respondents.	:	

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance_.

Reason for the continuance.

Parties are in the process of negotiating a resolution to the Motion for Relief.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: November 15, 2017

/s/ Jason Brett Schwartz
Attorney for Movant
Jason Brett Schwartz, Esquire
I.D. No.: 92009
(267) 909-9036

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- ☐ No alterations or interlineations of this document are permitted
☐ If this is not a first request for continuance, then a Motion for Continuance must be filed.